

**REMARKS**

Claims 1-27 are currently pending in this application. Claims 1-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,848,373 to DeLorme et al. ("DeLorme '373") in view of U.S. Patent No. 6,321,158 to DeLorme et al. ("DeLorme '158") and U.S. Patent No. 5,416,312 to Lamoure ("Lamoure").

Independent claim 1 describes a system for retrieving position-related information. The system comprises "a map, including a representation of a particular geographical area, and an address pattern comprising a pattern of dots disposed throughout said representation of the particular geographical area, wherein each specific geographical location within the geographical area is associated with a unique portion of the address pattern and can be identified from the associated unique portion of the address pattern." The system further comprises "an electronic reading device including a reading sensor for optically detecting a portion of the address pattern," and "a server for identifying a specific geographical location corresponding to the detected portion of the address pattern."

DeLorme '373 describes a computer aided map location system to provide correlation and coordination of spatially related data between a computer and a set of printed maps using a grid system. The grid system is described as enabling visual, intuitive, or other sensory correlation and coordination of spatially related location data. The Office Action appears to equate the printed map and grid system as described by DeLorme '373 with "a map including a representation of a particular geographical area" (referring to column 3-4, lines 55-14 of DeLorme '373) and an

address pattern “wherein each specific geographic location within the geographic area is associated with a unique portion of the address pattern” (referring to columns 4-5, lines 13-17, columns 7-8, lines 42-65, and column 50, lines 12-58 DeLorme ‘373) as found in claim 1. In addition, the Office Action asserts that DeLorme ‘373 describes “many form of the address pattern”, referring to column 50, lines 12-23 as describing grid “hash marks” in pixel form. The Office Action further asserts that from the cited portion of DeLorme ‘373 “it is obvious that an address pattern can be a dot pattern.” However, the cited portion of DeLorme ‘373 appears to refer to software drawing routines for drawing features, such as grid quadrangles and grid “hash marks” in pixel form, on an electronic display. Applicant submits that there is no teaching or suggestion that these grid “hash marks” are representative of an optically-detectable address pattern as found in claim 1.

The Office Action further refers to columns 62-64, lines 59-7 of DeLorme ‘373 as describing an electronic reading device for optically detecting a portion of an address pattern. However, the cited portions of DeLorme ‘373, as illustrated in Figs. 14E and 14F, describe marking of a location on a map with a pen or pencil and then digitizing a portion of the map with a handheld scanner for display as an image on a computer display. Applicant submits that there is no teaching or suggestion in the cited portion of DeLorme ‘373 of optically detecting a portion of an address pattern.

The Office Action has attempted to rely upon Lamoure to overcome deficiencies of DeLorme ‘373. In particular, the Examiner has referred to Lamoure as describing “an address

pattern comprising a pattern of dots disposed throughout representation of a particular geographical area” (referring to the abstract; column 2, lines 14-60; columns 3-5, lines 39-14; columns 5-6, lines 60-24; and columns 6-7, lines 44-4 of Lamoure). Applicant submits that there is no motivation to one of ordinary skill in the art to combine the teaching of DeLorme ‘373 and Lamoure. DeLorme ‘373 describes providing a grid system for enabling visual correlation and coordination of spatially related location data by a user. There is no teaching or suggestion by DeLorme ‘373 of using an electronic reading device to optically detect a portion of an address pattern. Thus, Applicant submits that one of ordinary skill in the art would not be motivated to combine the teaching of Lamoure with those of DeLorme ‘373.

The Office Action has further attempted to rely upon DeLorme ‘158 to overcome deficiencies of DeLorme ‘373 and Lamoure. In particular, the Office Action cites column 8, lines 12-67 of DeLorme ‘158 as describing “a server for identifying a specific geographic location corresponding to a detected portion of an address pattern.” The cited portion of DeLorme ‘158 describes a communication interface between a personal digital assistant (PDA) and a desktop computer to facilitate transfer of geographic data therebetween. An example is described in which information such as location marks can be recorded on the PDA at a remote location, and then transferred into the desktop computer. However, there appears to be no teaching or suggestion in DeLorme ‘158 of optically detecting a portion of an address pattern and using a server to identify a specific geographical location corresponding to the detected portion of the address pattern. For at least the foregoing reasons, Applicant respectfully submits that

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independent claim 1 is not taught, suggested, or rendered obvious by DeLorme '373 in view of DeLorme '158 and Lamoure and requests that the 35 U.S.C. 103(a) rejection of claim 1 be withdrawn.

Independent claim 14 describes a method for retrieving position-related information. The method includes the step of "optically detecting a selected position on an address pattern with an electronic reading device, said address pattern comprising a pattern of dots, said pattern of dots disposed throughout a representation of a geographical area and wherein said selected position can be determined from a detected portion of the address pattern that is near the selected position." The method further includes the steps of "sending an indication of the selected position from the electronic reading device to a server," and "identifying a geographical location within said geographical area that corresponds to the selected position."

The Office Action indicates that "claims 14-16 are method claims corresponding to system claims 1-3 above" and are "rejected for the same rationales set forth as above." For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that independent claim 14 is not taught, suggested, or rendered obvious by DeLorme '373 in view of DeLorme '158 and Lamoure and requests that the 35 U.S.C. 103(a) rejection of claim 14 be withdrawn.

Claims 2-13 and 15-26 are dependent upon and further limit their respective independent claim 1 and 14. For at least the reasons as discussed with regard to independent claims 1 and 14, Applicant respectfully submits that claims 2-13 and 15-26 are not taught, suggested, or rendered

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obvious by DeLorme '373 in view of DeLorme '158 and Lamoure, and requests that the 35 U.S.C. 103(a) rejection of claims 2-13 and 15-26 be withdrawn.

Claim 27 stands rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,751,380 to Victor et al. ("Victor") in view of DeLorme '373 and Lamoure. Independent claim 27 describes a method for producing a map for use with an electronic reading device. The method includes "assigning each position of a selected, optically detectable address pattern to a corresponding geographical location, said address pattern comprising a pattern of dots," and "identifying a region of the selected, optically detectable address pattern that corresponds to a geographical area to be represented on a map." The method further includes "printing the map on the identified region of the selected, optically detectable address pattern, such that each geographical location on the map is printed at the corresponding assigned position of the selected, optically detectable address pattern."

The Office Action refers to columns 3-4, lines 67-45 and column 5-7, lines 49-14 of Victor as describing "assigning each position of a selected, optically detectable address pattern to a corresponding geographical location" and "identifying a region of the selected, optically detectable address pattern that corresponds to a geographical area to be presented on a map." In contrast to claim 27, the cited portions of Victor are related to a system for detecting movement of an optical mouse over a surface having a grid pattern. Column 4, lines 19-23 of Victor describe that "there is no particular starting place for the mouse on the surface and it may be brought down any place on the surface, so long as there is sufficient room to move the mouse in a

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direction where cursor motion is desired.” Victor contains no teaching or suggestion of optically detecting a selected position on an address pattern.

Furthermore, the Office Action admits that Victor does not disclose “printing the map on the identifying region of the selected, optically detectable address pattern.” The Office Action has attempted to rely on DeLorme ‘373 and Lamoure to overcome this deficiency of Victor.

However, Applicant respectfully submits that, as Victor does not describe optically detecting a selected position on an address pattern, one of ordinary skill in the art would not be motivated to combine the teaching of Victor with those of DeLorme ‘373 and Lamoure. In addition, Applicant submits that even if Victor, DeLorme ‘373, and Lamoure were somehow combined, the combination would not result at the invention of claim 27. In view of the foregoing, Applicant respectfully submits that independent claim 27 is not taught, suggested, or rendered obvious by Victor in view of DeLorme ‘373 and Lamoure and requests that the 35 U.S.C. 103(a) rejection of claim 27 be withdrawn.

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In view of the above, it is believed that this application is in condition for allowance, and  
such a Notice is respectfully requested.

Respectfully submitted,

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